

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Manufacturing Resources International, Inc.,

Plaintiff,

v.

Civiq Smartscapes, LLC, *et al.*,

Defendants.

C.A. No. 17-269-RGA

**PUBLIC VERSION
FILED 5/13/2019**

**EXHIBITS AAAA, DDDD, GGGG-JJJJ AND LLLL-QQQQ [REDACTED] TO
BRIEF IN SUPPORT OF PLAINTIFF'S (MRI'S) RESPONSE TO DEFENDANTS'
MOTION FOR PARTIAL SUMMARY JUDGMENT AND TO EXCLUDE CERTAIN
EXPERT TESTIMONY**

Of Counsel:

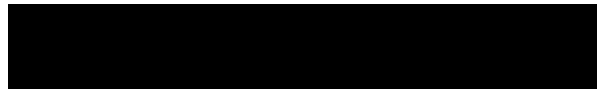
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*Attorneys for Plaintiff
Manufacturing Resources International, Inc.*

Dated: May 6, 2019

EXHIBIT AAAA



REDACTED

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Manufacturing Resources International, Inc.,

Plaintiff,

v.

Civiq Smartscapes, LLC, et al.,

Defendants.

C.A. No. 1:17-cv-00269-RGA

**DECLARATION OF ARIS SILZARS IN SUPPORT OF PLAINTIFF MRI'S RESPONSE
TO CIVIQ'S MOTION FOR SUMMARY JUDGMENT**

Of Counsel:

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Attorneys for Plaintiff
Manufacturing Resources International, Inc.

Dated: May 6, 2019

1. I have been retained as an independent expert witness by the law firm of Standley Law Group on behalf of Manufacturing Resources International, Inc. (“MRI”) in the case captioned Manufacturing Resources International, Inc. v. Civiq Smartscales, LLC, Civiq Holdings, LLC, Comark LLC, and Comark Holdings, LLC, Civil Action No. 1:17-cv-00269-RGA. Dist. of Delaware.
2. I have personal knowledge of the facts and opinions set forth in this declaration, and can testify competently to them if called upon to do so.

BACKGROUND AND QUALIFICATIONS

3. I received a BA degree in Physics from Reed College in 1963, a Masters degree in Physics from the University of Utah in 1965, and a Ph.D. degree in Electrical Engineering from the University of Utah in 1969.
4. I have been an active participant in the development of display technologies and products that use displays since 1974. I have managed research groups as large as 350 technologists in creating and implementing display technologies and high performance electronic circuits into products based on these technologies. In this experience, I have seen the importance of understanding how a product will be used and how chosen performance features will determine the predominant final product application.
5. I have an intimate knowledge of the state of display-related product development, including large displays that are used in outdoor environments, and can accurately reflect the current state of those product developments and the design issues when applied to severe environmental conditions. I have participated in numerous technical conference activities (including Program and General Chair of the International Society for Information Display symposium – the preeminent annual international conference on display technology) and made

numerous presentations on display product applications and on the technology evolution of those products. I was President of the Society for Information Display (“SID”) from 2000 – 2002. I am an industry consultant with a broad client base and continue to be active and knowledgeable regarding all new display-related products. I am on the technical advisory board of a company that specializes in large displays for commercial and advertising applications. I have actively contributed to their product development with innovations such as described in patent 8,963,895.

6. In my many years of engineering, manufacturing, and product development experience, I have personally been involved in the design of Liquid Crystal Displays (LCDs) and products based on those displays. I am intimately familiar with the technology, packaging, and thermal management concepts utilized in the products at issue in this case. I have spent a portion of my career managing a DuPont funded company with the goal of developing new materials and new technologies for heat management of electronics in such state-of-the-art products as the GM electrically powered automobile. With this broad knowledge of display-related products, with a solid grounding in pertinent thermal management technology and product packaging, with a historical and current perspective based on active personal participation, and with extensive experience related to product applications, I believe that I am qualified to provide an accurate assessment of the technical issues in this case.

7. Some example projects I have worked on over the years involve designing electronics equipment in harsh environments including: a heat sink design for the electronics control module for a General Motors electric car; and designing ruggedized electronic test equipment at Tektronix suitable for both indoor and outdoor use. Around the 2008 – 2009 timeframe, I assisted in the research and design of displays for indoor and outdoor use. Both LCD and LEDs were considered for products that could work in both environments. However, there were

limited engineering resources and consequently the LCD approach looked like it would be too difficult to implement. LEDs were selected instead. Heat management issues were an important consideration in these product design decisions.

8. My background and qualifications are summarized in my CV. I incorporate that CV, previously submitted, herein by reference.

PERSONAL KNOWLEDGE OF THE LINK DEVICE

9. I have also reviewed and physically inspected the accused [REDACTED]

[REDACTED]

10. I have also reviewed the transcripts of the depositions of Civiq employees Joshua Berglund, Kenneth Gray, Hanan Markovich, and Parag Shah.

11. I also made a plant visit to MRI's manufacturing facilities in Alpharetta, Georgia, and spoke directly with MRI employee Bill Dunn who personally gave me a tour of the MRI manufacturing facility.

12. I have opined that the accused devices, [REDACTED]

[REDACTED]

13. MRI's application of the [REDACTED]

[REDACTED]

14. [REDACTED]

15. [REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
16. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

17. A person of ordinary skill in the art would fully comprehend the plain meaning of the disputed language of Claim 18, and said language was disclosed in the specification of the '287 patent by way of its inclusion in original Claim 18, as well as original Claims 9 and 15.

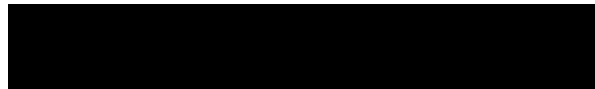
I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3 day of May, 2019 in the state of Washington.



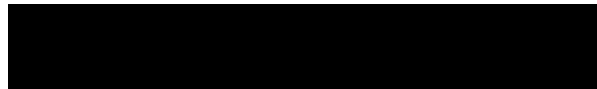
Dr. Aris Silzars

EXHIBIT DDDD



REDACTED IN ITS ENTIRETY

EXHIBIT GGGG



REDACTED

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Manufacturing Resources International, Inc.,

Plaintiff,

v.

Civiq Smartsapes, LLC, et al.,

Defendants.

C.A. No. 1:17-cv-00269-RGA

**DECLARATION OF BILL DUNN IN SUPPORT OF PLAINTIFF MRI'S RESPONSE TO
CIVIQ'S MOTION FOR SUMMARY JUDGMENT**

Of Counsel:

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*Attorneys for Plaintiff
Manufacturing Resources International, Inc.*

Dated: May 6, 2019

1. I have worked at MRI since its inception (at least as early as the 2004 timeframe).
2. I am an named inventor in U.S. Patent No. 8,854,595 (“the ’595 patent”); U.S. Patent No. 9,173,322; U.S. Patent No. 8,854,572 (“the ’572 patent”); U.S. Patent No. 8,773,633 (“the ’633 patent”); U.S. Patent No. 9,629,287 (“the ’287 patent”); U.S. Patent No. 9,173,325 (“the ’325 patent”) (the “patents-in-suit”).
3. I have personal knowledge of the facts and opinions set forth in this declaration, and can testify competently to them if called upon to do so.
4. Ex. EEEE, attached to Plaintiff MRI’s Answer to Civiq’s Motion for Summary Judgment is a true and accurate copies of sample MRI/LG-MRI Website screen shots demonstrating MRI virtual patent marking consistently and continuously over the years (at least as early as 2013 timeframe) (MRI00013422, MRI00013574, MRIMRI00324198-MRI00324236).
5. Ex. FFFF, attached to Plaintiff MRI’s Answer to Civiq’s Motion for Summary Judgment is a true and accurate copies of sample product patent marking labels for MRI products with an address to MRI’s/LG-MRI’s virtual patent marking Websites (MRI00324237-MRI00324240).
6. Ex. HHHH, attached to Plaintiff MRI’s Answer to Civiq’s Motion for Summary Judgment is a true and accurate copy of an [REDACTED] (MRI00009171).
7. Since at least as early as 2013, MRI has consistently and continuously marked substantially all of its patented products by labeling them with the word “patent” and an address to a Website that associates the patented article with the patent number(s).
8. Every BoldVu display manufactured by MRI since at least as early as 2013 has been labeled with a patent marking label having an address to MRI’s and/or LG-MRI’s virtual patent marking Website.

9. [REDACTED]
[REDACTED]

10. [REDACTED]
[REDACTED]

11. Since at least the 2013 timeframe, MRI, on its virtual patent marking Websites, has associated the listed MRI patent numbers with its LCD display products.

12. Since at least the 2013 timeframe, the MRI patent marking labels also label the patented displays as “CoolVu” products which refers to MRI’s patented display cooling technology.

13. After listing the ’633 and ’595 patents on the MRI virtual patent marking Websites, they have remained on the Websites to the present date.

14. MRI has been continuously and consistently marking substantially all of its patented display products with the ’633 and ’595 patents since as early as December 4, 2014 to the present date.

15. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

16. [REDACTED]
[REDACTED]

17. Since the inception of MRI in 2004 I have been involved in the design, sales and marketing of MRI products including flat panel products designed for outdoor use.

18. MRI produces a line of flat panel products suitable for outdoor use under the trademark BoldVu.

19. MRI has specifically sold BoldVu products in the United States and worldwide.

20. MRI's BoldVu products have been sold for outdoor digital signage applications, including "Smart City" use.

21. I am familiar with the NYC Link kiosk based upon seeing them in operation on the streets of New York City and from seeing videos of them on the Internet.

22. [REDACTED]
[REDACTED]
[REDACTED]

23. MRI BoldVu products are capable of being customized to include Wi-Fi, USB charging ports, phone calling and tablet power/usage.

24. Indeed MRI has sold BoldVu products with Wi-Fi, touch panels, power usage monitoring, with the capability to add USB charging ports, phone calling tablet, and other available peripherals and/or communication devices .

25. I believe Civiq's Link NYC kiosks infringe one or more of the MRI patents for which I am a named inventor.

26. At any time during the infringement period, had Civiq not infringed and had instead contracted with MRI, MRI would have provided and had the capability of providing an entire Kiosk as a complete solution for the New York smart city project.

27. [REDACTED]
[REDACTED]

28. [REDACTED]

29. MRI's BoldVu products are designed and built to withstand extreme thermal conditions.

30. Many of MRI's patents relate to MRI's designs for thermal protection of outdoor displays.

31. MRI's success with its outdoor flat panel products is directly related to MRI's patented thermal protection.

32. I am not aware of nor have I ever seen an outdoor flat panel kiosk that is capable of "Smart City" applications that perform as well as MRI's patented BoldVu products.

33. I am not aware of nor have I seen any outdoor flat panel kiosks that are capable of "Smart City" applications that would not infringe one or more of MRI's patents.

34. [REDACTED]

35. The '939 application is entitled LED Backlight Circuit System.

36. The '064 application is entitled Isolated Gas Cooling System for an Electronic Display.

37. [REDACTED]

38. [REDACTED]
[REDACTED]
[REDACTED]

39. [REDACTED]
[REDACTED]

40. [REDACTED]
[REDACTED]

41. It is my understanding that the '064 application is a parent provisional to all the asserted patents in the litigation between MRI and Civiq.

42. [REDACTED]
[REDACTED]
[REDACTED]

43. I am aware that Ms. Melissa Bennis has been retained in this case to opine on the issue of damages.

44. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

45. [REDACTED]
[REDACTED]
[REDACTED]

46. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

47. Since the inception of MRI I have been involved in the pricing of materials, and I frequently perform costing exercises.

48. I am familiar with the cost of various components used to manufacture flat panel display products, including components for kiosks.

49. [REDACTED]

[REDACTED]

[REDACTED]

50. [REDACTED]

[REDACTED]

51. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

52. [REDACTED]

53. [REDACTED]

[REDACTED]

[REDACTED]

54. [REDACTED]

55. [REDACTED]

[REDACTED]

56. [REDACTED]

[REDACTED]

57. [REDACTED]

58. [REDACTED]

59. [REDACTED]

60. [REDACTED]

[REDACTED]

61. [REDACTED]

[REDACTED]

62. [REDACTED]

[REDACTED]

63. [REDACTED]
[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of May, 2019.

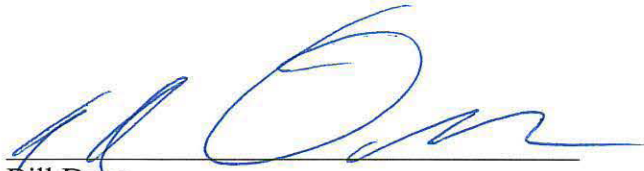

Bill Dunn

EXHIBIT HHHH



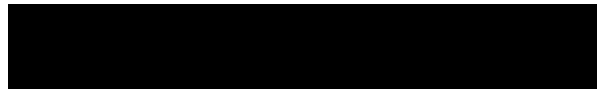
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EXHIBIT III



REDACTED IN ITS ENTIRETY

EXHIBIT JJJJ



REDACTED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Manufacturing Resources International, Inc.,

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v.

Civiq Smartscapes, LLC, et al.,

Defendants.

C.A. No. 1:17-cv-00269-RGA

**DECLARATION OF STEVE STOEFLER IN SUPPORT OF PLAINTIFF MRI'S
RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND
DAUBERT MOTION**

Of Counsel:

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rnewell@connollygallagher.com

*Attorneys for Plaintiff
Manufacturing Resources International, Inc.*

Dated: May 6, 2019

1. I am the Chief Financial Officer (“CFO”) of Manufacturing Resources International (“MRI”).
2. I have been the CFO of MRI since January 2015.
3. I have personal knowledge of the facts and opinions set forth in this declaration, and can testify competently to them if called upon to do so.

4. [REDACTED]
[REDACTED]

5. [REDACTED]
[REDACTED]
[REDACTED]

6. [REDACTED]
[REDACTED]

7. [REDACTED]
[REDACTED]

8. [REDACTED]
[REDACTED]

9. [REDACTED]
[REDACTED]
[REDACTED]

10. [REDACTED]

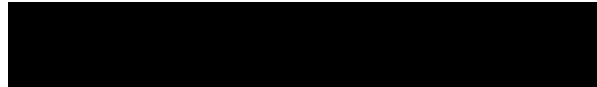
I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of May 2019, in the state of Georgia.



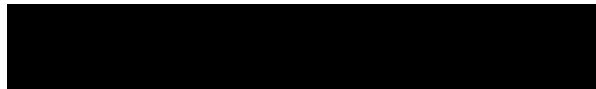
Steve Stoeffler

EXHIBIT LLLL



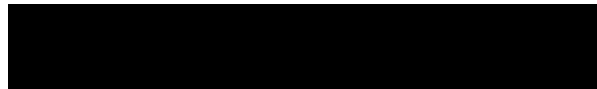
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EXHIBIT MMMM



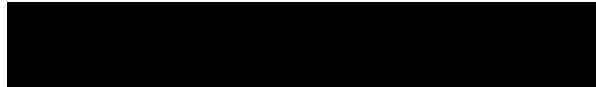
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EXHIBIT NNNN



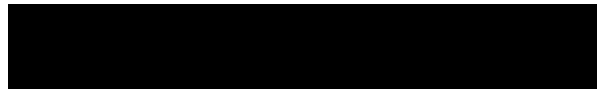
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EXHIBIT OOOO



REDACTED IN ITS ENTIRETY

EXHIBIT PPPP



REDACTED

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Manufacturing Resources International, Inc.,

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v.

Civiq Smartscares, LLC, et al.,

Defendants.

C.A. No. 1:17-cv-00269-RGA

**DECLARATION OF JAMES L. KWAK IN SUPPORT OF PLAINTIFF MRI'S
RESPONSE TO DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT
AND TO EXCLUDE CERTAIN EXPERT TESTIMONY**

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*Attorneys for Plaintiff
Manufacturing Resources International, Inc.*

Dated: May 6, 2019

I, James L. Kwak, declare as follows:

1. I am a partner at the law firm Standley Law Group LLP (“SLG”), counsel for Plaintiff Manufacturing Resources International, Inc. (“MRI”). I submit this declaration in support of Plaintiff’s MRI’s Response to Defendants’ Motion for Partial Summary Judgment and to Exclude Certain Expert Testimony, dated April 22, 2019 (hereinafter “Plaintiff MRI’s Response to Defendants’ Motion for Summary Judgment.” Unless stated otherwise, I have personal knowledge of the facts set forth below, and if called as a witness, could and would competently testify thereto.
2. I have personal knowledge of the facts and opinions set forth in this declaration, and can testify competently to them if called upon to do so.
3. Ex. BBBB, attached to Plaintiff MRI’s Response to Defendants’ Motion for Summary Judgment is a true and accurate copy of the ’287 patent file history.
4. Ex. CCCC, attached to Plaintiff MRI’s Response to Defendants’ Motion for Summary Judgment is a true and accurate copy of Provisional Application Serial No. 61/053,713.
5. Ex. DDDD, attached to Plaintiff MRI’s Response to Defendants’ Motion for Summary Judgment is a true and accurate copy of Attachment 1 to MRI’s supplemental objections and responses to Civiq Interrogatories 1 and 10.
6. Ex. EEEE, attached to Plaintiff MRI’s Response to Defendants’ Motion for Summary Judgment is a true and accurate copies of sample MRI/LG-MRI Website screen shots demonstrating MRI virtual patent marking consistently and continuously over the years (at least as early as 2013 timeframe) (MRI00013422-MRI0013433, MRI00013574-MRI0013594, MRI00324198-MRI00324236).

7. Ex. FFFF, attached to Plaintiff MRI's Response to Defendants' Motion for Summary Judgment is a true and accurate copy of MRI00324237-MRI00324240.
8. Ex. HHHH, attached to Plaintiff MRI's Response to Defendants' Motion for Summary Judgment is a true and accurate copy of MRI00009171.
9. Ex. IIII, attached to Plaintiff MRI's Response to Defendants' Motion for Summary Judgment is a true and accurate copy of the deposition transcript of Peter Kaszycki.
10. Ex. KKKK, attached to Plaintiff MRI's Response to Defendants' Motion for Summary Judgment is a true and accurate copy of Civiq Smartscapes, LLC; Civiq Holdings, LLC; Comark, LLC; and Comark Holdings, LLC's First Set of Requests for Production of Documents and Things to Plaintiff (Nos. 1-117), served September 15, 2017.
11. Ex. LLLL, attached to Plaintiff MRI's Response to Defendants' Motion for Summary Judgment is a true and accurate copy of MRI00023575, which was produced to Civiq on July 6, 2018.
12. Ex. MMMM, attached to Plaintiff MRI's Response to Defendants' Motion for Summary Judgment is a true and accurate copy of CIVIQ0135948, which was produced to MRI on July 25, 2018.
13. Ex. NNNN, attached to Plaintiff MRI's Response to Defendants' Motion for Summary Judgment is a true and accurate copy of the Expert Report of Anthony Sharp Regarding Noninfringing Alternatives.
14. Ex. OOOO, attached to Plaintiff MRI's Response to Defendants' Motion for Summary Judgment, is a true and accurate copy of the [REDACTED]
[REDACTED]
15. Ex. QQQQ, attached to Plaintiff MRI's Response to Defendants' Motion for Summary

Judgment is a true and accurate copy of MRI00324242, which was produced to Civiq on January 15, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 6, 2019 in Dublin, Ohio.

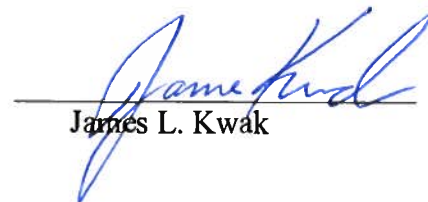

James L. Kwak

EXHIBIT QQQQ



REDACTED IN ITS ENTIRETY